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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

AT ANCHORAGE

ELIZABETH HEYNEN)	
)	Case No. 1:11-cv__-__
Plaintiff,)	
)	
vs.)	
)	
ALLSTATE INSURANCE)	
COMPANY,)	
)	
Defendant.)	<u>NOTICE OF REMOVAL</u>
_____)	

TO: The United States District Court
for the District of Alaska
Elizabeth Heynen

You are hereby notified that, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, Defendant Allstate Insurance Company ("Allstate"), has this day filed in the United States District Court for the District of Alaska this Notice of Removal to the United States District Court of the action brought by Plaintiff in the Superior Court for the State of Alaska, First Judicial District at Juneau, Case No. 1JU-11-0693 Civil. You are also notified that Defendant Allstate has filed a copy of this notice with the Clerk of the Superior Court for the First Judicial District at Juneau (attached as Exhibit A), and that

said action has thereby been removed from the Superior Court to the United States District Court.

The ground for removal is diversity of citizenship. 28 U.S.C. §§ 1332, 1441.

There is complete diversity of citizenship between the parties. Plaintiff is a citizen of the state of Alaska at the time of the accident causing injury. Defendant is a citizen of the state of Illinois. Plaintiff seeks damages in excess of \$75,000, exclusive of interest and costs. 28 U.S.C. § 1332(a). A copy of all process, pleadings and orders served upon Defendant Allstate will be filed as ordered by the court. A copy of the summons and complaint with related papers is attached.

Based on the above, this Court has original jurisdiction over this action, and Defendant Allstate is entitled to remove this action to this Court from the Superior Court for the State of Alaska. 28 U.S.C. §§ 1332, 1441, 1446.

DATED this 22nd day of June, 2011, at Anchorage, Alaska.

By: s/ Alfred Clayton, Jr.
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Certificate of Service

I certify that on 22nd day of June,
2011, a copy of the foregoing document
was served by mail on:

Mark Clayton Choate
Choate Law Firm LLC
424 N. Franklin Street
Juneau, AK 99801

s/ Alfred Clayton, Jr.

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